

Peak 7 Hazardous Fuels Reduction Project

Public Comments

Grouped by Commenter/Comment

Individuals and Organizations that submitted comments.

Comment Letter 1 Kirkwood Cunningham
 Comment Letter 1a Chief Berinao, Summit Fire and EMS Authority
 Comment Letter 1b Kenneth Wiegand
 Comment Letter 2 Tom Olden Jr.
 Comment Letter 3 Howard Brown
 Comment Letter 4 Jan Goodwin
 Comment Letter 5 Mary Hart
 Comment Letter 6 Thomas Beckett, Mountain Ghost
 Comment Letter 7 Bill Wolf, Colorado State Forest Service
 Comment Letter 8 Mary Siekman
 Comment Letter 9 David Brewster
 Comment Letter 10 Erin Jones
 Comment Letter 11 Howard Hallman and Brad Piehl, Forest Health Task Force
 Comment Letter 12 Ron Wallace

Comment Letter	Comment	Response
Project Support		
1a	The USFS has the support of Summit Fire & EMS.	Thank you for your support
1b	“As a member of the RWB Board of Directors and the Summit County Wildfire Council as well as a Breckenridge resident...I am very supportive of any and all steps to reduce hazardous fuels in the Peak 7 neighborhoods.”	Thank you for your support
6, 10	Peak 7 resident expresses support for fuelbreaks and fire mitigation efforts	Thank you for your support
7	Colorado State Forest Service fully supports the action.	Thank you for your support
12	“I am in favor of fire mitigation on Peak 7.”	Thank you for your support
Project Coordination/NEPA Process		
4	Have any of these areas reached greater than 60% mortality? Are there other areas that need to be added to this list	<p>Some portions of units have reached 60% mortality, but overall mortality at the stand level fall below 60%.</p> <p>The only units that are being considered at this time are adaptive management units identified in the Breckenridge</p>

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		Forest Health and Fuels EA (BFHFP).
8	Residents should have a FS contact during project implementation	A Forest Service representative contact will be available during project implementation.
8	Residents should be made aware of project plan and implementation timelines	The Forest Service will issue news releases prior to project implementation to inform the public of project implementation and closures.
8	Limitations should be placed on hours during which operations can occur in order to limit impact on local residents	Operations would be limited to weekdays, Monday-Friday. All operations (mechanized, hand-felling and pile burning) are limited to day light hours only. Additional restrictions may be considered where operations could adversely impact local residents.
9	Resource specialists should have been consulted for this project	Forest Service resource specialists reviewed the project proposal and provided comments related to their respective resource.
8, 9, 10, 11	CPZ's should be feathered into work on adjacent private lands	Visual aesthetics of treatment units would be considered during implementation. Feathering edges and extending treatments across multiple land ownerships would be utilized where feasible.
Timber/Forest Vegetation		
2	Please consider timber sales prior to automatic placement into any stewardship.	Timber sales, stewardship contracting, and contract pile and burn will be considered for each treatment area. The method chosen will be based on resource need, forest product values, contractor availability, road and access issues, residual fuel loadings and financial considerations.

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3	Natural succession to Spruce/Fir climax is a more desirable condition	This does not meet the purpose and need of the project of creating CPZ's and providing for firefighter safety. Though potentially more fire resistant, under certain conditions the spruce/fir cover type can exhibit more problematic fire behavior such as increased crown fire activity, increased spotting potential and distance, and increased fireline intensities. Spruce and fir are also susceptible to beetle infestations and die-back as we have seen across Colorado.
8, 9, 10, 11	Pockets of live Lodgepole pine should be left to increase age-class diversity and to protect from wind damage	The Forest Service will look at potential areas to leave pockets of live trees during the layout phase where: <ul style="list-style-type: none"> a.) Purpose and need are still met b.) Wind-throw is not likely c.) Trees are insect and disease-free
8, 9, 10, 11	Consider thinning as an alternative treatment method	Thinning falls within the range of prescriptions available for these units, and will be considered as a treatment option.
8, 9, 10, 11	Where aspen is present, areas should be managed to favor its vitality over other species	The Forest Service recognizes both species-and age-class diversity as integral components of forest health, and seeks to promote this diversity whenever possible, including enhancing aspen recruitment.
8, 9, 10, 11	Units 110, 111, 112, 124, 130, 134 and "most of" 122 are not close to houses or structures. Why were they selected and will CPZ criteria for treatments be utilized?	All of the selected units fall within the Wildland Urban Interface as identified and defined in the Summit County Community Wildfire

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		Protection Plan (SCCWPP). Most of the units are in or adjacent to SCCWPP identified focus areas, as well as being in or adjacent to important watersheds and/or Denver Water Board areas of concern. A detailed discussion of treatment area selection is tiered to the BFHFP, pp 6-7. In areas outside of the CPZ, more discretion may be used in treatment selection to focus on overall forest health, aspen enhancement, etc.
Fuels		
3	No trees more than 50 yards from occupied residences should be cut	This does not meet the purpose and need of the project. The effective size of fuel breaks has long been up for argument as many factors such as fuel types, terrain, weather and climate, and fire behavior all play a role in determining their efficacy. Agee <i>et al.</i> (2000) ¹ compiled and evaluated numerous studies focused on the size of fuel breaks in which effective sizes ranged from 200' to more than 1000' based on radiant heat measurements as it relates to firefighter safety. During recent fires in Summit County, flame lengths of greater than 100' were observed on both the Peak 2 Fire in 2017 and Buffalo Fire in 2018. According to the

¹ Agee, James K., B.Bahro, M.A. Finney, P.N. Omi, D.B. Sapsis, C.N. Skinner, J.W. van Wagtenonk, C.P. Weatherspoon. 2000. The Use of Shaded Fuelbreaks in Landscape Fire Management. Forest and Ecology Management. 127: 55-66.

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		<p>2014 Incident Response Pocket Guide (IRPG, PMS 461), safe separation between firefighter and flames, as identified in Safety Zone Guidelines (pg. 8), should be at least 4 times the flame length, or in this case, 400+'. Experience on the Buffalo fire, where a fuel break of 300-500' surrounded the communities of Wildernest and Mesa Cortina, proved this to be true on a local level where almost a billion dollars of infrastructure were protected with zero firefighter injuries or fatalities due to fire behavior.</p> <p>The Forest Service and cooperating fire officials believe that the size of the fuelbreaks in the Peak 7 Hazardous Fuels project area are adequate to provide local fire response a less hazardous foothold from which to engage future wildland fires.</p>
8, 9, 10, 11	Logging slash should be kept to the low end of the standard guidelines for safety and to reduce emissions from pile burning.	See tiered Design Criteria in the BFHFP (Fuels #1, #2 and #3; Watershed #2) and Design Criteria #1 in the Decision Memo.
Safety/Engineering		
8	Concern for the rehab/reclamation of temporary roads	See tiered Design Criteria in the BFHFP (Roads #5, #6n).
Recreation		
5, 11	Forest Service needs to do a better job protecting and rehabilitating trails	See tiered Design Criteria in the BFHFP (Recreation #2).
11	Managing trail closures will be important	See tiered Design Criteria in the BFHFP (Recreation #1, #3,

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		#4 and #6).
Soils/Geology		
1	The Forest Service needs to pay more attention to soil Carbon loss	A project Scale Carbon Effects report is included in the project record, where it was found that the scope and degree of change would be minor.
Air Quality		
1, 9	Forest Service needs to pay more attention to CO2 emissions in projects like this. Making wood available for firewood collection might offset some of the collective effects of burning for home heating and from pile burning.	<p>The Forest Service evaluates many fuels reduction methods, and where practical often chooses timber sales and biomass removal over pile and burning operations. When pile burning does occur, the Forest Service is held to stringent smoke permit conditions designed by the CO Dept of Public Health and Environment, Air Pollution Control Division. A project Scale Carbon Effects report is included in the project record.</p> <p>Firewood would be made available to the public by permit only, where feasible, for home heating purposes.</p>
Hydrology		
8	Stay out of the wetlands	See tiered Design Criteria in the BFHFP (Watershed, #4, #5, #8, #10, #16, and #27).
Heritage		
8	Has an archaeologist surveyed the area and what were the results?	A cultural resource inventory was conducted within the project area 2009-2011. Properties eligible for the National Register of Historic Places would be protected with no-action buffer zones.

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		Forest Archeologist determined that activities implemented under this project would have no adverse effects on archaeological sites or historic properties provided the USFS follows all of the stipulations of the Programmatic Agreement. Tiered to BFHFP, p.107.
Scenery		
8, 9, 10, 11	Aesthetics are important and straight boundaries are unsightly. Unit edges should be blended or feathered into the surrounding landscape.	See tiered Design Criteria in the BFHFP (Scenery, #1, #9, #12 and #13).
Suggested Alternatives/Modifications		
3	No trees in areas within, or adjacent to, an inventoried roadless area should be cut.	No treatments are proposed in the Hoosier Ridge Roadless area. Units 340 and 341 are adjacent to roadless area, but also within the WUI as detailed in the SCCWPP. They additionally fall into the CPZ as defined within the background of the Peak 7 Hazardous Fuels Reduction Project. As such it is within Forest Plan and SCCWPP guidance to treat fuels within units 340 and 341 identified in this project.
8,9,10,11	We request the creation of a written, long-term management strategy specific to this, and other projects, in the area. We suggest the area be monitored at 3, 5, 10, and 20 year intervals after treatment.	A written management strategy, titled <i>Peak 7 Hazardous Fuels Project...Forest Management Strategy</i> has been created and added to the project record.